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AT 8:30 _____ M
WILLIAM T. WALSH, CLERK

United STATES District Court
For The District of New Jersey

Michael Majette
Plaintiff's

VS

Civil Action: _____

Commissioner Marcus Hicks
Commissioner Victoria L. Kohn
Administrator Patrick Nogan
Administrator — Gongji
Administrator — Sims
Administrator — Vera
S. I. D. John / Jane Doe
Custody John / Jane Doe
Puttyers Medical Service John / Jane Doe
Classification John / Jane Doe
Defendants

1A. Jurisdiction is asserted pursuant to 42 U.S.C. § 1983 (applies to state prisoners).

1b. Indicate whether you are a prisoner or other confined person as follows: Convicted AND state prisoner

2. Previously Dismissed Federal Civil Actions or Appeals

A Parties to previous lawsuit: Q

B. Court AND docket number: Q

C. Grounds for dismissal: Q

D. Approximate date of filing lawsuit: Q

E. Approximate date of disposition: Q

3. Place of Present Confinement:
East Jersey STATE Prison LOCK BAY R
RAYWAY, NJ 07065

4: Parties:

A. NAME of Plaintiff: Michael
Majette

Address: East Jersey STATE Prison Lock
BAG R Bayway, NJ 07065

Inmate: SBI# 905021B; state# 1164918

B. First Defendant:

NAME: Commissioner Marcus Hicks AND
Commissioner Victoria L. Kuhn

Official position: Oversees New Jersey
Department of Corrections

Place of employment: STATE of New Jersey
Department of Corrections Whittley Rd.
P.O. Box 863 Trenton, NJ 08625-0863

Violation of Eighth Amendment:

Allowing defendants at Northern State Prison inflict cruel and unusual punishment by classify a ~~danger~~ inmate in cell with Plaintiff, that have a known violent history AND use K2 synthetic weed, not following classification policy in placing inmates that are compatible with each other AND deliberate indifference to serious medical need at Northern State Prison by allowing defendants not to follow policy afterwards of injuries suffer AND for not having a investigation done by S.I.D. or Administration

Violation of Fourteenth Amendment:

Denied equal protection of law inmates similar situated like Plaintiff in providing safety to Plaintiff in restricted housing.

c. Second defendant:

Administrators: P. Nagon, — Gorgi-
— Sims, — Vera.

Official Position: Oversees Northern
STATE Prison AND enforce Policy imple-
ment by Commissioner of New Jersey

Place of employment: Northern State
Prison 168 Frontage Newark, NJ 07114-
2300

Violation of Eight Amendment cruel and
unusual punishment failure to investigate
the assault, injuries, deliberate indifference
to a serious medical need allowing medical
at Northern State Prison to deny medical
attention after hospital stay at University
hospital in Newark, NJ

Violation of Fourteenth Amendment:
Denied equal protection of law inmates
similar situated like Plaintiff, failure to

investigate assault on Plaintiff, failure to implement policy and procedure in classify Plaintiff in cell with NON-violent inmates or inmates who use drugs.

D. Third defendant:

Name: S. I. D. (Special) Intelligent Division John / Jane Doe

Official Position: Investigation Unit of inmates conduct, assault and Correctional Officers order by Administration or Commissioner of New Jersey

Place of employment: Northern STATE Prison 168 Frontage Newark NJ 07114-2300

violation of Eight Amendment: cruel and unusual punishment fail to investi-

gate the assault on Plaintiff, failure to administer any type of remedy due to serious nature of assault or hold anyone accountable, deliberate indifference to a serious medical need by not order medical defendant's John/ Jane Doe to implement policy and procedure for proper medical attention and/or allowing classification to place Plaintiff life in danger by placing him in a cell with a violent inmate and known drug user

violation of Fourth Amendment: Denied equal protection of the law other inmates in restrictive housing similar situated like Plaintiff in housing, medical attention and safety.

E. Fourth Defendant:

NAME: Custody John/ Jane Doe

OFFICIAL position: Safety And Security of inmates at Northern State Prison Restricted Housing Unit

Place of employment: Northern STATE Prison 168 Fran Jorge Newark, NJ 07114-2300

Violation of Eight Amendment: cruel and unusual punishment failure to follow policy and procedure after assault, contact S.I.D., file a injury report after assault And deliberate indifference to a serious medical need failure to follow policy and procedure on inmate on inmate assault.

violation of Fourteenth Amendment: Denied equal protection of the law inmates similar situated like Plaintiff in

Administer help after assault, contact S.I.D. for investigation or filing any injury report pertain to assault.

F. Fifth Defendant:

Name: Putyers medical Service
John/Dave Doe LPN's / RN's

Official Position: Administer proper medical Attention to inmates at Northern State Prison including Restricted housing, follow up care and physical therapy.

Place of employment: Northern State
Prison 108 Frontage Newark NJ 07114-
2300

Violation of Eight Amendment: cruel and unusual punishment failure to follow policy and procedure as a medical-profession after assault C.L.P.N.'s / R.N.'s-

deliberate indifference to a serious medical need after assault, failure to provide physical therapy After assault and proper medical care result into Plaintiff having a mental or medical disorder.

violation of Fourteenth Amendment:

Denied equal protection of law inmates similar situated like Plaintiff in medical care, physical therapy and/or proper care pertain to New Jersey Dept. of Correction Medical policy

G: Sixth Defendant:

NAME: Classification John / Jane Doe

Official position: Classify inmates in cell with other inmates based on Age, height, weight, history of drug use and violent past or present.

Place of employment: Northern State
Prison 108 Frontage Newark, NJ 07114-
2300

Violation of Eighth Amendment:
Cruel and unusual punishment placing
Plaintiff in cell with a larger inmate
that double his size in weight, height
violent and known drug user to assault,
create major injuries to Plaintiff head,
eyes, ankles, staples in his head and
disfigurement of eyesocket and/or
other major medical issues not pertain
to classification policy for New Jersey
Department of Correction

Violation of Fourteenth Amendment:
Denied equal protection of the law
inmates similar situated like Plaintiff
in classify Plaintiff to be housed in
cell that protect his safety from
cell mates.

5. I previously have sought informal or formal relief from the Appropriate administrative officials regarding the Acts complained of in the Statement of Claims on Page 12-17.

Plaintiff file inquiry - grievance on October 20, 2020. and exhausted to Trenton Central office "Denied Relief". Plaintiff also file a Tort claim with Trenton Central Office on December 3, 2020 "Denied Relief".

6. STATEMENT of Claims:

7. On or about October 14, 2020 Plaintiff was housed at Northern State Prison Restricted housing D3 West classified by classification at Northern State Prison.

8. On or about October 14, 2020 Plaintiff was placed in cell on D3 West Restricted housing unit by classification at Northern State Prison.

9. Plaintiff was placed in the cell with a larger inmate, double his size, taller than him, A known user of smoking K2 synthetic weed and violet to other inmates and for his cellies.

10. Plaintiff went to custody many times to be placed in the cell with someone that didn't smoke K2 synthetic weed, his age bracket, nor violent was denied by custody on D3 West.

11. On or about October 14, 2020 2:00 p.m. Plaintiff woke up at Rutgers University hospital in Newark, New Jersey prior to a

assault by his cellie from smoking
K2 synthetic weed.

12. Plaintiff suffer severe head injuries,
that require (4) staples to close
wounds on his head, broken ankle,
operation on his ankle with pins
inside his ankle which require a
cane to walk proper, tooth knockout-
brace on upper tooth area where he
can't eat proper, broken cheek
bones, broken right orbit in right
eye, operation on right eye and
(3) broken ribs

13. These injuries have left Plaintiff
in complication with medical
issues, not remember things, constant
headache, barely can walk or see

14. On or about October 20, 2020
Plaintiff was transfer back to

Northern State Prison from university health hospital in Newark, New Jersey.

15. Plaintiff was placed into medical infirmary for about 2 days and only given a cane and/or denied physical therapy for his injuries by medical defendants.

16. From October 14 - 20, 2020 Defendants at Northern State Prison never offer any investigation of what happen, file a injury report as required by New Jersey Department of correction policy and/or S.I.D. come and talk with Plaintiff

17. The defendant's swept Plaintiff's assault under the rug, physical injury and turn a blind eye to serious medical injury Plaintiff have at this present moment.

18. Relief

Plaintiff is been transfer to a halfway house called Liberty House 510 Liberty Street Camden, NJ 08104 from East Jersey STATE Prison LOCK BAG R DAYWAY, NJ 07065. Plaintiff need defendants to order Physical Therapy for his serious injuries to his right eye, ankle And /or deem Necessary for Plaintiff to function in his daily Activities without cost.

19. Plaintiff ask that defendants not retaliate or in concert with Liberty House to violate him due to his physical injury under the A. D. A. "American Disability Act"

20. A declaration that the Acts and omissions described herein violated Plaintiff's rights under the

Constitutional And laws of the United States

21. Compensatory damages in the amount of \$ 500,000.00 Against each defendant, jointly And severally.

22. Punitive damages in the Amount of \$ 500,000.00 Against each defendant.

23. A jury trial on all issues triable by jury.

24. Plaintiff's cost in this suit

25. Any additional relief this court deem just, proper and equitable

Dated: March 28, 2022

Michael Majette #905021B
Respectfully Submitted:

Michael Majette #905021B
IS/Michael MAJETTE SBI #905021B
East Jersey State Prison
Lock Bag R
Rayway, NJ 07065

Cert. of Service

I, Michael Majette hereby certify
that the legal document 42 USC 1983 is
true and correct 28th day of
MARCH 2022 to following person(s):

Executed at Rayway, New Jersey
On 2022

Michael Majette
Signature:

Michael Majette
PRINT NAME